

EXHIBIT 7

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

LACI N. BLANCHARD,)
Individually, and as next)
friend of W.B., surviving)
minor child of RONNIE P.)
BLANCHARD, JR.,)
Plaintiffs,)
)
vs.) Civil Action No. 22-CV-2420
)
SANARE ENERGY PARTNERS,)
LLC,)
Defendant.)

REMOTE ORAL VIDEOTAPED DEPOSITION OF
PERCY LORMAND III
December 3, 2024

REMOTE ORAL VIDEOTAPED DEPOSITION OF PERCY
LORMAND III, produced as a witness at the instance of
the Plaintiffs and duly sworn, was taken in the
above-styled and numbered cause on the 3rd day of
December, 2024, from 10:04 a.m. to 3:11 p.m., before
Vickie G. Hildebrandt, Certified Shorthand Reporter
in and for the State of Texas, reported by
computerized stenotype machine with the witness
located in Lafayette, Louisiana, pursuant to the
Federal Rules of Civil Procedure and the provisions
stated on the record or attached hereto.

APPEARANCES

FOR PLAINTIFFS:

Alec Paradowski, Esq.
Jim Long, Esq.
ARNOLD & ITKIN LLP
6009 Memorial Drive
Houston, Texas 77007
Telephone: 713.222.3800
E-mail: aparadowski@arnolditkin.com
jlong@arnolditkin.com

FOR DEFENDANT NPC LAND & MARINE, LLC:

Shannon R. Ramirez, Esq.
GIEGER, LABORDE & LAPEROUSE, L.L.C.
5151 San Felipe, Suite 750
Houston, Texas 77056
Telephone: 832.255.6000
E-mail: sramirez@glllaw.com

FOR DEFENDANT ALL COAST, LLC:

Matthew Moeller, Esq.
THE MOELLER FIRM
650 Poydras Street, Suite 1207
New Orleans, Louisiana 70130
Telephone: 504.702.6794
E-mail: matthew@moellerfirm.com

FOR DEFENDANTS WARRIOR ENERGY CORPORATION D/B/A
FASTORQ AND SUPERIOR ENERGY SERVICES - NORTH AMERICA
SERVICES, INC.:

Leah M. Homan, Esq.
BRADLEY ARANT BOULT CUMMINGS, LLP
600 Travis, Suite 5600
Houston, Texas 77002
Telephone: 713.576.0300
E-mail: lhoman@bradley.com

1 FOR DEFENDANT SANARE ENERGY PARTNERS, LLC:

2 Robert E. Freehill, Esq.

3 Caroline E. Bossier, Esq.

4 HALL MAINES LUGRIN PC

2800 Post Oak Boulevard, Suite 6400

Houston, Texas 77056

Telephone: 713.586.4294

5 E-mail: rfreehill@hallmaineslugrin.com

cbossier@hallmaineslugrin.com

6
7
8 FOR DEFENDANT SBS ENERGY SERVICES:

9 Henry LeBas, Esq.

LEBAS LAW OFFICES

10 2 Flagg Place, Suite 1

Lafayette, Louisiana 70503

11 Telephone: 337.236.5500

E-mail: hlebas@lebaslaw.com

12
13
14 FOR DEFENDANT HARDY OILFIELD SERVICES, LLC:

15 Roger H. Nebel, Esq.

MARON MARVEL BRADLEY ANDERSON & TARDY, LLC

16 1235 N. Loop West, Suite 1106

Houston, Texas 77008

17 Telephone: 713.659.0002

E-mail: rnebel@maronmarvel.com

18
19
20 ALSO PRESENT:

21 Audrey Brown, Videographer

Bobby Bray

22 Taylor Fox

INDEX

PAGE

PERCY LORMAND III

Examination by Mr. Paradowski	7
Examination by Mr. Freehill	107
Examination by Mr. Moeller	131
Examination by Mr. LeBas	145
Examination by Ms. Homan	159
Further Examination by Mr. Freehill	170
Examination by Mr. Long	173

EXHIBITS

EXHIBIT	DESCRIPTION	PAGE
Exhibit 1	Photographs	58
Exhibit 2	SANARE_004594 - POB List	77
Exhibit 3	SANARE_0004596-004597 - Sanare Energy Partners JSA dated March 25, 2022	81
Exhibit 4	Sanare MP 64 BOP Stack R2 File	89
Exhibit 5	NPC 205-207 - NPC Land & Marine, LLC Independent Contractor Agreement	109
Exhibit 6	Sanare Energy Partners SEMS Manual	113
Exhibit 7	JSA	128
Exhibit 8	All Coast, LLC Offshore HSE Orientation Topics	132
Exhibit 9	AC 0211 - Daily Safe Operation Plan	133

Page 4

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Exhibit 9A	AC 0586-0596 - All Coast JSA	135
	dated March 25, 2022	
Exhibit 10	Photograph	160
Exhibit 11	Flange Torque Report	162
Exhibit 12	Change-out Tubing Procedure	173
Exhibit 13	Statement	174

1 for is you're just making sure that the work is being
2 performed safely, right, sir?

3 A. Yes.

4 Q. And so you're kind of floating back and forth
5 between knocking things out in the office and going out
6 and doing these rounds that we're talking about?

7 A. Yes.

8 Q. Do you remember, sir, roughly how long happened
9 between -- or how long passed -- how much time passed
10 between the work starting the morning of March 25th,
11 2022 and the hydraulic workover unit falling into the
12 water?

13 A. I mean, we started the tour at 6:00 and the
14 incident happened at 8:33, so...

15 Q. And you mentioned that you were in your office
16 when the HWO actually fell over, right?

17 A. Yes.

18 Q. Tell me what -- and you actually saw the HWO
19 fall into the water?

20 A. I saw it falling towards the lift boat and
21 once -- once it went -- and it ended up going off my
22 sight because the lift boat is, like, 35, 40 feet
23 above -- higher than that. I'd have to get the
24 elevation, you know. It's -- it -- it disappeared
25 from my view after a point when it got past the hull

1 of the lift boat.

2 Q. Good point.

3 So you didn't actually see it hit the
4 water --

5 A. No.

6 Q. -- you just saw it falling?

7 A. Right, and heard -- and heard it -- a bang
8 hit. You know, it was just a loud bang and when --
9 part of it hit the hull of the lift boat.

10 Q. Understood.

11 So part of the HWO hit the hull of the
12 lift boat?

13 A. Looking at where it laid, it was the Hardy
14 System.

15 Q. The Hardy System hit the --

16 A. -- one of the --

17 Q. -- lift boat?

18 A. -- one of the -- one of the beams -- one of
19 the four.

20 You can look at the picture and you
21 could figure -- you know, you could tell the
22 trajectory of where it was and where it landed, you
23 know, in the -- what it looks like to me, as far as
24 from the pictures, the HWO did not hit the -- hit the
25 lift boat.

1 Q. Yeah, and --

2 MR. NEBEL: Object, nonresponsive.

3 A. That's just -- that's just -- that's just
4 looking at the after pictures, you know.

5 Q. Right, and -- and, look, I'm not trying to hold
6 you to any of this and -- and get you to say, look, the
7 God's honest truth is this hit this or this hit that.

8 A. Yeah, I -- like I said, I saw it start
9 toppling over and then it disappeared from my view.

10 Q. Understood.

11 And so what I kind of want to
12 understand, Mr. Lormand, is when you're sitting in
13 the office, did you hear something that alerted you
14 to there was a problem or did you just happen to look
15 out the window as the HWO was starting to tip over?

16 A. Just happened to look out the window.

17 Q. And we'll look at the POB list here in -- here
18 in a bit but there's something like 15 or 20 people at
19 least on this crew, right?

20 A. I'd have to look at the list but, yeah, I
21 think -- I mean, we had -- I don't remember what the
22 total POB was at that time.

23 Q. And -- I'm sorry, go ahead.

24 A. Let's see.

25 Q. Are you looking at the POB list?